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BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc., Inc.
236 Massachusetts Avenue, N.E. Suite 110
Washington, DC 20002

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Federal Communications Commission
Office of Secretary

**EB Docket No. 06-36
EB-06-TC-060**

Re: CERTIFICATION OF CPNI FILING - FEBRUARY 6, 2006

**Home Telephone Company, Inc. - FCC 499 Filer ID: 807198
Home Telecom LLC - FCC 499 Filer ID: 825274
Home Long Distance, Inc. - FCC 499 Filer ID: 811382**

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary
Byron McCoy, Telecommunications Consumers Division
Best Copy and Printing (BCPI)

No. of Copies rec'd 044
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Home Telephone Company, Inc. - FCC 499 Filer ID: 807198

Home Telecom LLC - FCC 499 Filer ID: 825274

Home Long Distance, Inc. - FCC 499 Filer ID: 811382

P. O. Box 1194, Moncks Corner, South Carolina 29461

CERTIFICATION

I am an officer of Home Telephone Company, Inc. and its affiliated companies, Home Telecom LLC and Home Long Distance, Inc. (collectively the "Company"). On behalf of the Company, I hereby certify that I have personal knowledge that the Company is in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.¹ Accompanying this certificate is a statement explaining how the Company is in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Keith Oliver
Senior Vice President
Home Telephone Company, Inc.
Home Telecom LLC
Home Long Distance, Inc.

February 3, 2006

Attachment

¹ 47 C.F.R. §§ 64.2001-2009.

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STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Home Telephone Company, Inc. and its affiliated companies, Home Telecom LLC and Home Long Distance, Inc. (collectively the “Company”) is complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2000-2009).

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Part 64, Subpart U, Section 64.2003(d) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under the FCC’s Part 64, Subpart U, Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC’s rules at Part 64, Subpart U, Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC’s Part 64, Subpart U CPNI rules.

STATEMENT OF FCC CPNI RULE COMPLIANCE

FCC's CPNI rules at Part 64, Subpart U, Section 64.2008. The Company has complied with the notice requirements for Opt-Out approval. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

7. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's Part 64, Subpart U CPNI rules.

8. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.